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Briefing Report to the Chairman, Subcommittee on Treasury, Postal Service, and General Government, Committee on Appropriations, U.S. Senate

August 1988

CUSTOMS SERVICE

Importing Community Should Benefit From PAIRED Program

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The Honorable Dennis DeConcini
Chairman, Subcommittee on Treasury,
Postal Service, and General Government
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

As requested in Senate Report 100-160, dated September 17, 1987, and in subsequent discussions with the Subcommittee, this briefing report provides information on the Customs Service's Port of Arrival Immediate Release and Enforcement Determination (PAIRED) program. PAIRED permits entry documentation to be filed at one port, usually an interior port, to obtain release of merchandise arriving at another U.S. port, usually a seaport. Customs established the PAIRED program between certain ports to facilitate the earliest possible release of merchandise from Customs' custody. Before PAIRED, merchandise was either released at the port of arrival or transported under a Customs bond to the interior port of entry before it could be released from Customs' custody.

Customs designed PAIRED to complement existing merchandise-entry methods, while offering earlier and less costly merchandise release for the importer or broker. PAIRED was also designed to reduce Customs' paperwork and processing requirements. Customs chose to keep the PAIRED program voluntary; the decision to participate lies with the importer or broker.

As agreed with the Subcommittee, the report focuses on the following areas:

-- Customs' responsibilities and procedures for processing imported goods;

-- objectives and limitations of the PAIRED program;

-- program scope and performance to date;

-- importing community perceptions of the program and its potential replacement; and

-- legal issues regarding Customs' authority to implement the program.

APPROACH

Because the PAIRED program has not been implemented to the point where Customs can provide routine reports that measure program results, performance, costs, and benefits, we obtained much of our information from documentation maintained by officials in Customs headquarters and field offices. We also discussed the program with Customs officials, brokers, importers, and carriers.

We concentrated our work at Customs headquarters and in five Customs port cities. These ports were (1) Atlanta and Savannah, Georgia, which were the first ports to test PAIRED and have a high level of PAIRED participation; (2) Kansas City, Missouri, and Portland, Oregon, two other large and widely separated ports that have extensive PAIRED participation; and (3) New York, New York, a large port that had no PAIRED entry activity. Our objectives, scope, and methodology are presented in appendix II.

RESULTS IN BRIEF

The PAIRED program gives importers and brokers another option for the release of imported merchandise into the United States. Under this program, an importer or broker can file Customs entry documents at a Customs designated inland port--port of destination--for release of merchandise located at a port of arrival, usually a seaport. PAIRED allows a faster, more convenient release of merchandise destined for inland ports. It still allows the options of direct release at the port of arrival and in-bond shipment to inland ports if importers or brokers prefer. If the merchandise destined for an inland port is selected for Customs examination, it is required to be shipped in-bond to the inland port for examination.

The PAIRED program appears to offer few risks or additional costs to Customs, and the benefits to the industry appear to offset most disadvantages. The following are our observations on the PAIRED program:

-- The PAIRED program is not precluded by statute and thus is within Customs' discretion to implement. The lack of clarity in Customs' appropriations language may have discouraged some Customs District Directors, importers, and brokers from participating. (See p. 20.)

-- As of April 1988, 106 of 282 Customs ports had the requisite computer capability to use PAIRED. Of these 106 ports, 51 reported PAIRED activity. (See p.18.)

-- Nationwide, PAIRED entries accounted for less than 1 percent of the total entries (4,654,569) filed during the first 7 months of fiscal year 1988. (See p.18.)

-- Customs does not allow the PAIRED program to be used for merchandise subject to inspection (high-risk merchandise) or goods subject to import quotas or other agencies' jurisdiction. (See p.12.)

-- Perceived advantages of PAIRED include (1) faster release and delivery of merchandise, (2) reduction in costs, (3) reduced paperwork, and (4) increased business for inland brokers. For Customs, paperwork and processing requirements are reduced. (See p.14.)

-- Perceived disadvantages of PAIRED include (1) having to use in-bond shipment if a PAIRED entry is sought but denied, (2) poor communications between Customs ports, (3) problems in coordinating transportation, and (4) decrease in business for seaport brokers. Items (2) and (3) were believed to be temporary start-up problems that can be resolved. (See p.16.)

-- A proposed "triangle" entry option to replace the PAIRED program is being discussed in Customs and the importing community. Triangle entry would allow entry documents to be filed at any Customs port with inspection and release at the port of arrival, thus allowing merchandise to be shipped directly to the importer. Some members of the importing community have opposed its implementation. (See p.22.)

We discussed the results of our work with Customs officials and they agreed with our presentation of the information and our observations. They also pointed out that the "triangle" entry option which is being considered has supporters as well as opponents in the importing community.

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As arranged with the Subcommittee, unless you publicly announce its contents earlier, we plan no further report distribution until 10 days after the report date. At that time we will send copies to interested parties and make copies available to others upon request. Should you need additional information on the contents of this briefing report, please call me at 275-8389.

Sincerely yours,

Arnold P. Jones
Senior Associate Director

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ABBREVIATIONS

PAIRED	Port of Arrival Immediate Release and Enforcement Determination

APPENDIX I

THE PAIRED PROGRAM

U.S. CUSTOMS SERVICE RESPONSIBILITIES

The U.S. Customs Service's mission is essentially the same as when founded about 200 years ago. Customs is responsible for the (1) control, regulation, and facilitation of carriers, persons, and articles entering or departing the United States; (2) assessment, collection, and protection of revenue accruing to the United States from duties, taxes, and fees; and (3) enforcement of all statutes, regulations, and rulings governing the admission of merchandise into the United States.

As a border enforcement agency, Customs' mission has been extended over the years to assist in the administration and enforcement of some 400 provisions of law. For example, Customs is responsible for enforcing various provisions of laws aimed at protecting American agriculture, business, and public health. These include statutes relating to motor vehicle safety and emission control standards, radiation and radioactive material standards, illegal narcotics and pornography, animal and plant quarantine requirements, and food and hazardous substance prohibitions.

Customs carries out its responsibilities through its headquarters in Washington, D.C., 7 regions, 42 districts, and 282 ports. While most of the ports are located at seaports and entry points on our borders with Canada and Mexico, there are also numerous inland ports located for the most part in the larger cities and industrial and commercial centers.

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GAO U.S. Customs Service's Responsibilities

- Assessing and collecting duties, excise taxes, fees, and penalties
- Processing persons, carriers, cargo, and mail into and out of the United States
- Enforcing all statutes, regulations. and rulings governing the admission of articles into the United States

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WHAT IS THE PAIRED PROGRAM?

The Customs Service's Port of Arrival Immediate Release and Enforcement Determination (PAIRED) program is a voluntary program under which an importer or broker can file entry documents at one port, usually an inland port, for the release of merchandise located at another port, usually a seaport. Customs designed the program to allow earlier and less costly release of merchandise to importers and brokers, while at the same time reducing Customs' paperwork and processing requirements. Also, Customs intended the PAIRED program to be a relatively simple procedure under its Automated Commercial System, the computer-based network that links Customs' facilities nationwide.

Customs releases imported merchandise into the United States in two ways. First, an importer or broker can file the necessary entry documents at the port of arrival, called direct release, and arrange for the merchandise to be released and shipped to any desired location. Alternatively, the importer or broker can arrange for the merchandise to be shipped under a Customs bond to a more conveniently located inland port, port of destination, where the entry documents are filed and the merchandise released for shipment to the desired location.

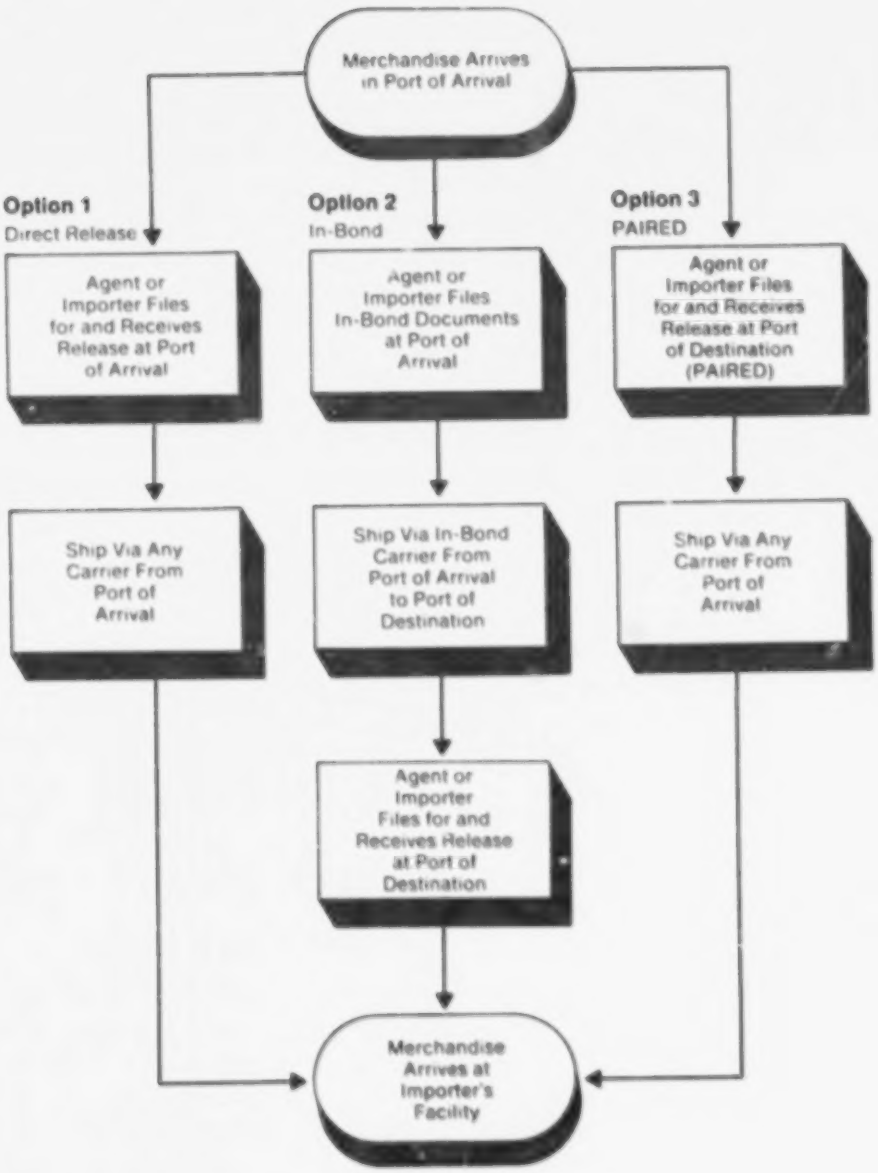
To enhance the traditional release methods, Customs introduced the PAIRED program in 1984 first as a test and then implemented it in 1987. The PAIRED program offers the importer or broker the opportunity to file Customs entry documents from an inland port of destination for release of merchandise located at the port of arrival or enroute to the port of arrival. The merchandise then can be released and shipped to the importer's ultimate destination without incurring the time delays and costs of employing an agent at the port of arrival or shipping merchandise inland under a Customs bond.

The PAIRED program's basic premise is that in-bond shipment of merchandise that is not likely to receive Customs' examination is unnecessary. Imported merchandise that is likely to receive intensive examination cannot be shipped under PAIRED.

APPENDIX I

Figure I.1:

What is the PAIRED Program?


Merchandise Arrives in Port of Arrival
Option 1
Direct Release
Option 2
In-Bond
Option 3
PAIRED
Agent or Importer Files for and Receives Release at Port of Arrival
Agent or Importer Files In-Bond Documents at Port of Arrival
Agent or Importer Files for and Receives Release at Port of Destination (PAIRED)
Ship Via Any Carrier From Port of Arrival
Ship Via In-Bond Carrier From Port of Arrival to Port of Destination
Ship Via Any Carrier From Port of Arrival
Agent or Importer Files for and Receives Release at Port of Destination
Merchandise Arrives at Importer's Facility

OBJECTIVES OF THE PAIRED PROGRAM

The PAIRED program's objectives are to facilitate the release of merchandise from Customs' custody and to reduce paperwork. In general, the program was intended to allow an earlier and less costly Customs release of imported merchandise, thereby streamlining the process for both Customs and the importing community. Merchandise that is imported routinely and infrequently inspected by Customs appears best suited for PAIRED entry.

Facilitating Release

Importers are interested in obtaining a timely release of imported merchandise. The PAIRED program is seen as one way to ensure more timely merchandise release without placing additional costs or burdens on either Customs or importers. The importer or broker may file the entry documents at a more convenient inland port of destination, yet obtain release and direct shipment from the port of arrival, thereby avoiding the costs and inconvenience of having merchandise shipped in-bond to the inland port of destination.

The PAIRED program is simply an alternative and, in effect, combines the advantages of the traditional methods of release without some of the costs, inconveniences, or delays. The PAIRED program is particularly suited to repetitive, routine imports that are not likely to be inspected.

Reducing Paperwork

To the extent that the PAIRED release option is used in lieu of the in-bond release option, entry paperwork preparation and handling is reduced. In-bond movement requires that a Customs immediate transport document be prepared and submitted to Customs at the port of arrival. Customs must process this document at both the port of arrival and port of destination. According to brokers, elimination of the immediate transport document saves document preparation and handling costs. No precise estimates of savings were available since the savings may vary greatly depending on the circumstances and the locations.

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GAO Customs Objectives for the PAIRED Program

- Facilitate the release of merchandise
- Reduce paperwork

LIMITATIONS ON PAIRED USAGE

The PAIRED program is not an option for high-risk merchandise that requires examining for possible contraband or other serious violations of law. In addition, the PAIRED option cannot be used for merchandise subject to quotas or restrictions by other federal agencies. It is not a viable option for air cargo at this time.

High-Risk Merchandise not Allowed

Customs' partially implemented Automated Commercial System computer program is designed to deny PAIRED entry requests for high-risk merchandise subject to intensive examination. It applies risk assessment criteria by importer, country of origin, manufacturer, and local Customs port criteria to determine whether merchandise will be examined by Customs inspectors. About 20 percent of all entries are examined.

Quota Merchandise is Excluded From PAIRED Entry

Merchandise subject to import quotas cannot be entered under the PAIRED program. Quotas limit the quantity of a commodity that may be imported during a specified period and/or the duty rate for this period. Customs cannot determine if the quota has been reached or apply the appropriate quota duty until the merchandise arrives and the documents are reviewed, thus negating the pre-filing advantages of PAIRED.

Air Cargo not Likely to be PAIRED

According to Customs officials, imported merchandise currently arriving by air is not a good candidate for the PAIRED program. Entries filed for release under PAIRED must have the invoice attached. The invoices for air cargo typically accompany the shipment and are not available before arrival. This negates the pre-filing advantage. According to Customs, as the import industry moves toward automation, invoices may be electronically transmitted, making air cargo more amenable to PAIRED entry.

Other Agency Requirements Restrict PAIRED Usage

The laws and regulations administered by other federal agencies may prohibit or limit entry, restrict routing, or require additional labeling and processing before release. Such merchandise may be inspected at the port of arrival or port of destination, which is incompatible with the PAIRED entry process.

APPENDIX I

GAO Limitations on PAIRED Usage

- High-risk merchandise
- Merchandise subject to quota
- Air cargo
- Other agency requirements

PERCEIVED ADVANTAGES OF THE PAIRED PROGRAM

Importing community and Customs officials commented on the advantages or benefits of the PAIRED program. The most commonly mentioned benefits were faster release of merchandise, elimination of in-bond charges, reduced paperwork, reduced handling costs, and increased business for inland brokers. We were unable to place dollar values on these benefits.

Faster Release and Receipt of Merchandise

Of the 28 brokers interviewed, 16 said the PAIRED program allows for a more timely delivery of merchandise. According to some brokers, when the PAIRED option is used in lieu of in-bond shipment, merchandise is released and importers receive their merchandise up to 4 days faster. Release documents can be filed and accepted 5 days in advance of the vessel arrival date. Therefore, using PAIRED, an entry can be filed and the merchandise released before it actually arrives in the United States. Upon arrival, Customs does not need to maintain physical control of the goods. The merchandise may proceed directly to its intended destination without going in-bond to another Customs port for further Customs processing.

Elimination of In-Bond Charges and Reduced Handling Costs

The costs of having an in-bond document prepared at the port of arrival and the costs of having the merchandise shipped in-bond are not incurred under PAIRED. Because of the early release under PAIRED, handling costs may be reduced since the merchandise is not (1) stored at the port of arrival while processing is completed and shipping arrangements made or (2) warehoused at the port of destination awaiting Customs release.

Larger Market for Inland Brokers

Of the 14 inland brokers interviewed, 11 said they foresee an increase in their business due to the PAIRED program. Assuming that the majority of the imported merchandise is destined for inland locations, inland port brokers have a greater opportunity to use the PAIRED program.

As shown in figures III.1 and III.2, PAIRED entries and releases show that inland ports may have benefitted from the PAIRED program. The pattern is most noticeable in the North Central Customs Region where 1,686 PAIRED entries were filed but nearly all releases occurred outside the region.

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Perceived Advantages of the PAIRED Program

- Faster release and receipt of merchandise
- Eliminates in-bond charges and reduces handling costs
- Larger market for inland brokers

PERCEIVED DISADVANTAGES OF THE PAIRED PROGRAM

In general, industry officials did not perceive major disadvantages to the PAIRED program. The disadvantages they mentioned included increased costs if the PAIRED option is sought but denied, communication problems among Customs ports, problems created by carriers' unfamiliarity with the program, and a decrease in seaport brokers' business. We were unable to obtain or develop any cost estimates for these disadvantages.

Denial of PAIRED Entry Causes Inconvenience

Even though PAIRED entry is requested, merchandise must be shipped in-bond to the port of destination if Customs determines an examination is necessary. According to industry officials, the resulting in-bond shipment is inconvenient and can cause increased transportation time and costs. Before PAIRED, however, this was the only option available other than direct release at the seaport.

Communication Problems Among Customs Ports

Of the 28 brokers interviewed, 15 said they have encountered communication problems with Customs. In most cases the problem was in obtaining the actual physical release of merchandise at the port of arrival after the port of destination had approved the PAIRED entry. According to a Customs port director, this is simply a start-up problem that can be eliminated over time.

Problems with Merchandise Delivery

Inland brokers said problems may occur because they are not physically present at the port of arrival to arrange shipments and some carriers are not familiar with PAIRED release documentation. Destination port brokers have to hire the services of arrival port brokers to resolve any problems, thus incurring additional service costs. Again, Customs officials said they believe this problem will diminish as the industry becomes familiar with the program.

Decrease in Business for Seaport Brokers

Of the 28 brokers interviewed, 15 said the PAIRED program is disadvantageous to seaport brokers because they are losing clients to inland brokers. When importers hire inland brokers to obtain release for merchandise coming into seaports, seaport brokers lose the revenue they otherwise would receive for preparing in-bond documents and filing entries at the seaport.

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GAO Perceived Disadvantages of the PAIRED Program

- Denial of PAIRED entry causes inconvenience
- Communication problems among Customs ports
- Problems with merchandise delivery
- Decrease in business for seaport brokers

CURRENT PAIRED PROGRAM USAGE

At our request, Customs created a computer program to extract certain PAIRED program data from its Automated Commercial System. While we have not tested or verified the accuracy of the data or the system from which they are provided, the statistics nevertheless provide a broad picture of PAIRED implementation for the first 7 months of fiscal year 1988 (the program was not automated before 1988). PAIRED activity figures are shown in appendix III.

PAIRED Activity is Small Compared to Total Activity

For the first 7 months of fiscal year 1988, the PAIRED program accounted for 12,679 Customs entries. This is a small portion (0.27 percent) of the 4,654,569 Customs entries for this period. During these same 7 months, 971,893 in-bond shipments originated. The remainder represents direct release.

Most PAIRED Activity is in Customs' Southeast Region

Customs' six-state Southeast Region accounted for about 67 percent of the total PAIRED entries during the first 7 months of fiscal year 1988. The Pacific and North Central Regions combined had about 31 percent of the PAIRED entries during this period, while the remaining four regions accounted for about 2 percent.

Fifty-one Customs Ports Participate in the PAIRED Program

Participation in the PAIRED program is voluntary. Importers and brokers choose to participate. Customs District Directors, however, must approve use of the program in their Districts.

As of April 20, 1988, only 106 of 282 Customs ports had the computer capability for PAIRED program participation. According to the Customs PAIRED Program Manager, the 106 eligible ports account for about 98 percent of all Customs entries. During the first 7 months of fiscal year 1988, 51 ports actually participated in the PAIRED program.

New York is an example of a high-volume port that had no PAIRED entry activity. New York brokers and Customs officials told us there is little local importing community interest in the PAIRED program. No PAIRED entries and only five PAIRED releases were reported in the 7 months; their origination could not be readily determined.

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GAO Current PAIRED Program Usage

- PAIRED activity is a small part (.27 percent) of overall Customs entries
- Most of the PAIRED activity (67 percent) is concentrated in the Southeast Region
- Fifty-one of 282 Customs ports participate in the PAIRED program

LEGAL ISSUES

The National Customs Brokers and Forwarders Association of America questioned the legality of the PAIRED program on the basis that the program is not permitted under 19 USC Section 1484 (a)(2)(A), which specifies that entries "shall be filed at such place within the customs-collection district where the merchandise will be released from customs custody. . . ."

Customs' Chief Counsel, in a memorandum dated June 14, 1985, determined that the PAIRED program was not precluded by statute and could be implemented by regulation. The Chief Counsel's position views the term "release" in its constructive rather than actual sense. Thus, under this interpretation, a "release" of goods occurs wherever it is determined Customs has no further need for physical custody. This may occur at a port other than the port of arrival. PAIRED quidelines provide that if an entry is submitted at a port where the merchandise is not ultimately destined, it should be rejected. If the merchandise must be inspected, then inspection occurs where the entry was filed. The interpretation by Customs, as the cognizant agency, carries significant authority. Moreover, we believe their interpretation is reasonable and we accept it.

Funding restrictions contained in Customs' 1988 Appropriation Act, enacted December 22, 1987, raised an additional legal question regarding funding for the PAIRED program. The law stated that "[n]one of the funds appropriated by this Act may be used to establish on a permanent basis any test or program of the 'port of arrival immediate release and enforcement determination'" (Public Law 100-202, sec. 521).

Customs implemented the PAIRED program on a permanent basis on August 21, 1987. Public Law 100-202 was enacted 4 months after the PAIRED program was implemented. A question arises as to whether the law was intended only to prevent implementation or to freeze PAIRED program activity. It is Customs' view, and we agree, that Public Law 100-202, which provided appropriations for fiscal year 1988, had no effect since the PAIRED program had been implemented in the previous fiscal year. Nonetheless, there has been some confusion in the importing community which may have discouraged some PAIRED activity, according to Customs officials.

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GAO Legal Issues

- The PAIRED program is not precluded by statute and thus is within Customs' discretion to implement by regulation
- A statutory prohibition against the use of fiscal year 1988 funds to implement the PAIRED program had no effect since the program was implemented in fiscal year 1987

CUSTOMS' ALTERNATIVE TO THE PAIRED PROGRAM

A recent Customs' report proposed a "triangle" entry option that could replace the PAIRED program. This option is still in the discussion stage. However, some officials within the importing community believe the triangle concept could prove harmful to their activities and have opposed its implementation.

Customs' Proposed Triangle Entry

A report dated February 1988, prepared by a management consulting firm for Customs, proposed a triangle entry method that could replace the PAIRED program. Triangle entry would allow entry documents to be filed at any Customs port, with inspection and release at the Customs port of arrival, and would allow shipment of merchandise directly to the importer's warehouse. This concept differs from PAIRED entry in that under the PAIRED program (1) merchandise must be destined for the port in which the entry is filed and (2) if Customs inspection is required the merchandise must be inspected at the port in which the entry is filed. The report listed "opportunities for Customs" and the triangle concept was one of the initiatives described as high impact with potential benefits to Customs and the importing community.

Importing Community Concerns About Triangle Entry Concept

The National Customs Brokers and Forwarders Association said they are not vigorously opposed to PAIRED, but they are adamantly opposed to the proposed triangle entry method. They believe the triangle entry method will adversely impact the pattern of entry and merchandise release among Customs ports; specifically, smaller ports may lose business to the larger ones. Also, the National Treasury Employees Union told us that changes in Customs employee staffing levels is a concern. They said the present PAIRED program has little impact on Customs staffing but the proposed triangle entry method could conceivably change staffing levels among Customs ports. Specifically, Customs would shift staffing to the ports of arrival where most merchandise would be released under the triangle entry method.

Customs officials said they are evaluating the triangle concept. We believe Customs may encounter opposition from broker and employee associations if the triangle concept is implemented without a thorough evaluation of its potential impact on the importing community.

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Customs' Alternative to the PAIRED Program

- Customs' proposed triangle entry
- Industry concerns about the triangle concept

OBJECTIVES, SCOPE, AND METHODOLOGY

At the request of the Senate Committee on Appropriations, as specified in Senate Report 100-160, dated September 17, 1987, we developed information on the Customs Service's Port of Arrival Immediate Release and Enforcement Determination (PAIRED) program. As agreed in a subsequent discussion with the Subcommittee on Treasury, Postal Service, and General Government we gathered information on six key areas. These areas were (1) program background and history, (2) extent of implementation to date, (3) program success in facilitating release of imported merchandise, (4) program costs, (5) importing community's attitudes toward the program and its potential replacement, and (6) program compliance with legislative intent.

We interviewed Customs officials at both headquarters and field levels and obtained statistical data and published background information on the PAIRED program. We visited Customs ports in Atlanta and Savannah, Georgia; Kansas City, Missouri; Portland, Oregon; and New York, New York. At these sites, we obtained the views of Customs officials, brokers, and importers. We also talked with representatives from the transportation industry, the National Brokers and Forwarders Association of America, and the National Treasury Employees Union.

To determine the current level of program activity we asked Customs to extract PAIRED program statistical information from their Automated Commercial System data base. Customs provided us with program statistical data for the period October 1, 1987, to April 30, 1988. Before October 1, 1987, the program was not automated. We did not verify Customs' automated data base or the program figures given us by Customs.

We did most of our work at the Atlanta and Savannah Customs ports. We selected these ports because they had the most extensive program activity, were the first ports to test the program, and had the most experience with the program. We also did limited work at Customs ports in Kansas City and Portland because they had a high PAIRED usage and they also provided information on widely dispersed ports. In addition, to determine why some ports with a high volume of entries do not participate in the program, we visited the New York City Customs port and discussed the PAIRED program with local brokers and Customs officials.

For interviews, we judgmentally selected 10 brokers and 10 importers each in the Atlanta and Savannah ports and 4 brokers and 4 importers each in Kansas City and Portland. In total, we talked to 33 percent of the brokers located in and doing business

with the four ports. The total number of importers in the four ports could not be determined.

Our work in New York to determine why the port does not participate in the PAIRED program was limited to discussions with brokers and Customs officials. We discussed the PAIRED program with four New York brokers who volunteered to meet with us.

We did not attempt to project the views obtained from the interviews we did to the entire importing community. However, we attempted to draw a representative cross section and discussed both our selection and general results obtained with a national brokers association, individual brokers, importers, and Customs officials. We discussed our report with Customs officials and their comments were considered in preparing this report.

Our review of the PAIRED program was made from January to July 1988. We did our work in accordance with generally accepted government auditing standards.

CURRENT PAIRED PROGRAM USAGE

Table III.1:

Ports of Arrival With More Than 100 PAIRED Entries October 1, 1987, to April 30, 1988

Port of arrival	PAIRED entries released	Total PAIRED entries (%)
Port Everglades, FL	2,815	22.2
Puget Sound, WA	1,945	15.3
Charleston, SC	1,848	14.6
Savannah, GA	1,418	11.2
Los Angeles, CA	1,030	8.1
Norfolk, VA	782	6.2
Ponce, PR	759	6.0
Miami, FL	661	5.2
Jacksonville, FL	412	3.2
Wilmington, NC	332	2.6
San Francisco, CA	245	1.9
Total	12,247	96.5

Source: U.S. Customs Service's PAIRED Entry Listing, dated May 19, 1988.

Table III.2:

Ports of Destination With More Than 100 PAIRED Entries October 1, 1987, to April 30, 1988

Port of destination	PAIRED entries filed	Total PAIRED entries (%)
Miami, FL	2,833	22.3
Portland, OR	1,869	14.7
Atlanta, GA	1,669	13.2
Charlotte, NC	942	7.4
San Juan, PR	766	6.0
Peoria, IL	675	5.3
Jacksonville, FL	641	5.1
Kansas City, MO	637	5.0
Tampa, FL	588	4.6
Savannah, GA	312	2.5
Charleston, SC	293	2.4
Port Everglades, FL	227	1.8
Reno, NV	208	1.6
St. Louis, MO	174	1.4
San Diego, CA	141	1.1
Total	11,975	94.4

Source: U.S. Customs Service's PAIRED Entry Listing, dated May 19, 1988.

Table III.3:

PAIRED Activity by Port
October 1, 1987, to April 30, 1988

Port of destination	PAIRED entries filed	Port of arrival	PAIRED entries released
Miami, FL	2,833	Port Everglades, FL	2,815
Portland, OR	1,869	Puget Sound, WA	1,945
Atlanta, GA	1,669	Charleston, SC	1,848
Charlotte, NC	942	Savannah, GA	1,418
San Juan, PR	766	Los Angeles, CA	1,030
Peoria, IL	675	Norfolk, VA	782
Jacksonville, FL	641	Ponce, PR	759
Kansas City, MO	637	Miami, FL	661
Tampa, FL	588	Jacksonville, FL	412
Savannah, GA	312	Wilmington, NC	332
Charleston, SC	293	San Francisco, CA	245
Port Everglades, FL	227	Baltimore, MD	79
Reno, NV	208	West Palm Beach, FL	74
St. Louis, MO	174	Portland, OR	61
San Diego, CA	141	New Orleans, LA	52
Norfolk, VA	99	Fernandina Beach, FL	41
Davenport, IA	94	Atlanta, GA	39
Baltimore, MD	85	Philadelphia, PA	22
Salt Lake City, UT	61	Tampa, FL	22
West Palm Beach, FL	61	Mayaguez, PR	6
Birmingham, AL	56	Annapolis, MD	5
Orlando, FL	56	New York, NY	5
Puget Sound, WA	36	Mobile, AL	3
Mobile, AL	33	San Juan, PR	3
Dallas/Ft. Worth, TX	32	Brunswick, GA	2
Cleveland, OH	28	Chicago, IL	2
Wilmington, NC	21	Orlando, FL	2
Nashville, TN	17	Aberdeen, WA	1
Milwaukee, WI	9	Boston, MA	1
Chicago, IL	7	Charleston, WV	1
Anchorage, AK	3	Charlotte, NC	1
Greenville, SC	2	Columbus, OH	1
New Orleans, LA	2	Dallas/Ft. Worth, TX	1
Dayton, OH	1	Dayton, OH	1
Fernandina Beach, FL	1	Georgetown, SC	1
		Greenville, SC	1
Total	12,679	Memphis, TN	1
		Pascagoula, MS	1
		Pensacola, FL	1
		Peoria, IL	1
		St. Louis, MO	1
		Total	12,679

Source: U.S. Customs Service's PAIRED Entry Listing, dated May 19, 1988.

Table III.4:

PAIRED Activity by Customs Region
October 1, 1987, to April 30, 1988

Region	PAIRED entries filed	PAIRED entries released
Northeast	85	107
New York	0	5
North Central	1,686	6
Southeast	8,511	9,221
South Central	108	57
Southwest	32	1
Pacific	2,257	3,282
Total	12,679	12,679

Source: U.S. Customs Service's PAIRED Entry Listing, dated May 19, 1988.

APPENDIX III

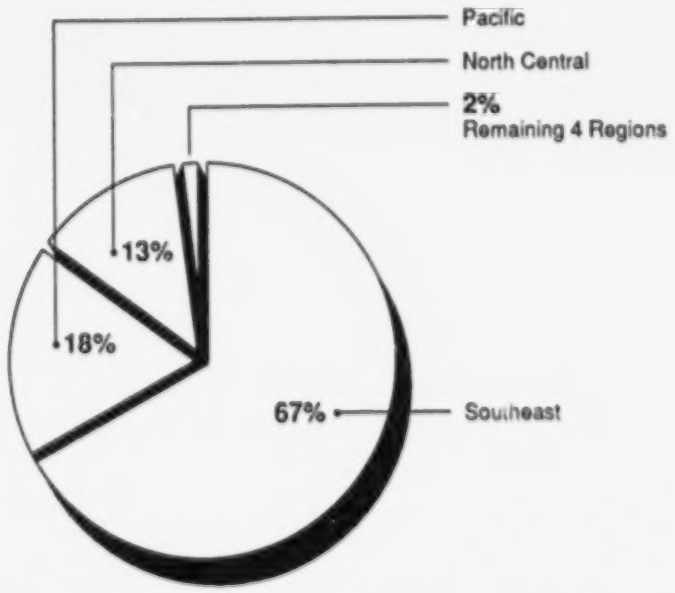
Figure III.1:

PAIRED Entries by Customs Region October 1, 1987, to April 30, 1988

Note: Alaska and Hawaii included in Pacific Region.

Note: Puerto Rico and Virgin Islands included in Southeast Region.

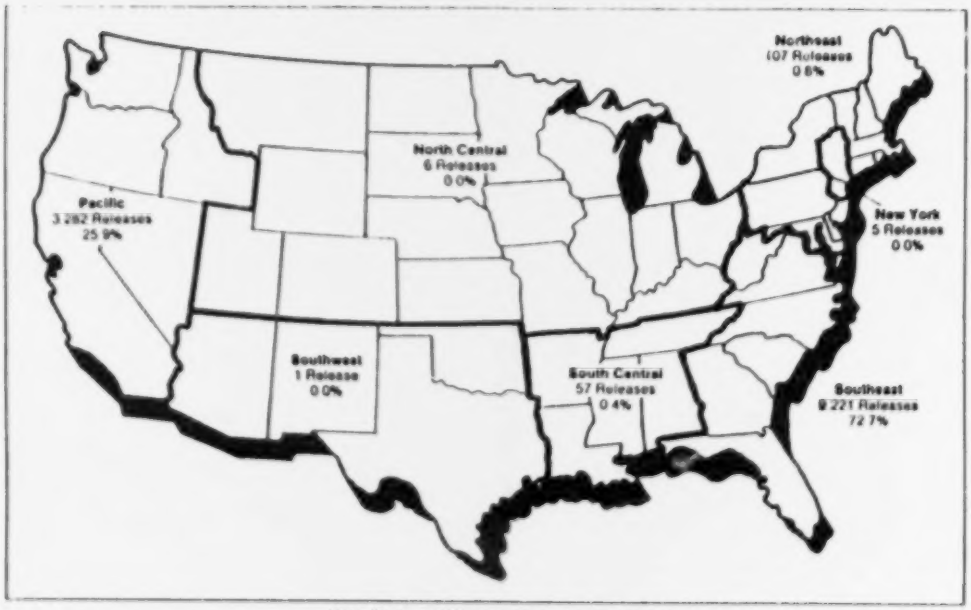
Source: United States Customs Service's PAIRED Entry Listing, dated May 19, 1988.



Source: United States Customs Service's PAIRED Entry Listing, dated May 19, 1988.

Figure III.2:

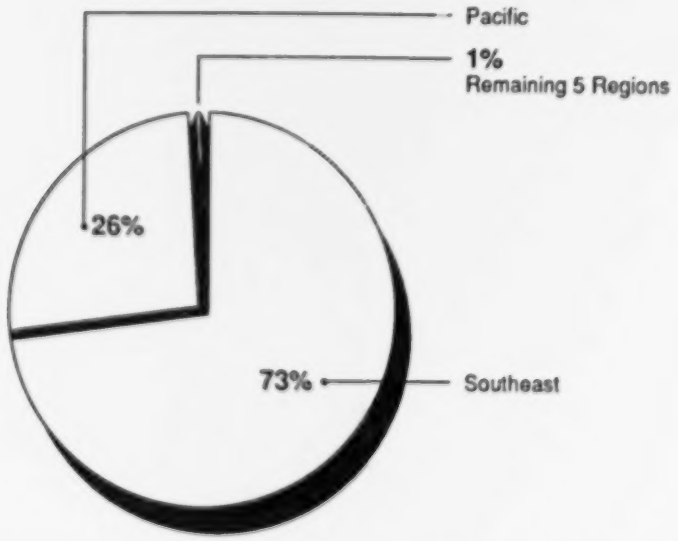
PAIRED Releases by Customs Region October 1, 1987, to April 30, 1988



Note: Alaska and Hawaii included in Pacific Region.

Note: Puerto Rico and Virgin Islands included in Southeast Region.

Source: United States Customs Service's PAIRED Entry Listing, dated May 19, 1988.



Source: United States Customs Service's PAIRED Entry Listing, dated May 19, 1988.

APPENDIX III

Figure III.3:

PAIRED Ports for Atlanta, Kansas City, and Portland Customs Ports

Source: United States Customs Service's PAIRED Entry Listing, dated May 19, 1988

GLOSSARY

Customs Broker	Person or firm licensed by Customs to transact business with Customs on behalf of importers.
Entry	A document filed with Customs as a record of importation, description, value, and disposition of a given lot of imported merchandise by an importer, broker, or bonded carrier.
Examination	A review of the documentation that lists, for example, the items contained in the shipment, country of origin, or manufacturer. It may also include a physical examination of all or some of the merchandise.
Importer	One who imports goods.
Port of Destination	Customs port where imported merchandise is destined.
Port of Arrival	Customs port where merchandise first arrives in the United States.
Quota	A quantity control on imported merchandise.
Release of Merchandise	The transfer, with Customs' permission, of merchandise to the carrier or bonded warehouse proprietor for delivery to the importer or his agent.

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